

BILL KINKEAD
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Amarillo, Texas 79109
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Attorney for Debtors

UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
AMARILLO DIVISION

IN RE:

WHEELER HOSPITALITY, INC.	§	CASE NO. 10-20166-rlj11
PERRYTON HOSPITALITY, INC.	§	CASE NO. 10-20167-rlj11
BORGER PROPERTIES, INC.	§	CASE NO. 10-20168-rlj11
CHILDRESS HOSPITALITY, L.P.	§	CASE NO. 10-20169-rlj11
BORGER HOSPITALITY, INC.	§	CASE NO. 10-20170-rlj11
DECATUR HOSPITALITY, INC.	§	CASE NO. 10-20171-rlj11
Debtors	§	
	§	Jointly Administered Under
	§	CASE NO. 10-20166-rlj11

**APPLICATION FOR ORDER AUTHORIZING DEBTORS
TO EMPLOY CHARLES F. KUNTZ, CPA AS ACCOUNTANT**

NOTICE

NO HEARING WILL BE CONDUCTED HEREON UNLESS A WRITTEN RESPONSE IS FILED WITH THE CLERK OF THE UNITED STATES BANKRUPTCY COURT AT P. O. BOX 15960, AMARILLO, TX 79105-0960 BEFORE THE CLOSE OF BUSINESS ON **JUNE 17, 2010** WHICH IS **TWENTY ONE (21) DAYS FROM THE SERVICE OF THIS MOTION**. IF SERVICE IS BY MAIL, THREE ADDITIONAL DAYS ARE ALLOWED PURSUANT TO FED.R. BANKR.P. 9006 (f).

ANY RESPONSE MUST BE IN WRITING, FILED WITH THE CLERK AND A COPY SERVED UPON COUNSEL FOR THE MOVING PARTY WITHIN THE TIME DESCRIBED ABOVE. IF NO RESPONSE IS TIMELY FILED, THE RELIEF REQUESTED SHALL BE DEEMED UNOPPOSED AND THE COURT MAY ENTER AN ORDER GRANTING THE RELIEF SOUGHT.

IF AN OBJECTION IS FILED, A HEARING WILL BE SET WITH NOTICE ONLY TO THE OBJECTING PARTIES.

TO THE HONORABLE COURT:

WHEELER HOSPITALITY, INC., PERRYTON HOSPITALITY, INC, BORGER PROPERTIES, INC., CHILDRESS HOSPITALITY, L.P., BORGER HOSPITALITY, INC., AND DECATUR HOSPITALITY, INC., the debtors in the above-referenced cases jointly administered under case no. 10-20166-rlj11, apply in the Court for an order authorizing the employment of Charles F. Kuntz, CPA as accountant for the debtors in their Chapter 11 cases. In support of this application, the debtors show and represent as follows:

1. On March 12, 2010, the debtors filed voluntary petitions for relief under Chapter 11 of the Bankruptcy Code. The debtors have remained in possession of their assets and are now operating their businesses as debtors in possession.

2. It is essential that debtors be authorized to employ a certified public accountant to provide routine business accounting services and prepare tax returns from debtor's books and records when such services are required. The firm of Charles F. Kuntz, CPA has served as the debtors' accountant for their hotel operations for years prior to the bankruptcy filings.

3. The debtors believe that Charles F. Kuntz, CPA is highly qualified to render such services and will be able to render these services more efficiently and more economically than a firm that is not already familiar with the debtors' books and records.

4. The debtors are informed that Charles F. Kuntz, CPA is experienced in accounting procedures applicable to hotel operations and is fully familiar with accounting practices involving Chapter 11 debtors.

5. Charles F. Kuntz, CPA has agreed to perform, during the pendency of the Chapter 11 case, those accounting services set out in the Verified Statement attached hereto as "Exhibit A". Said Verified Statement sets forth the billing rates which will be charged to the debtors for the services to be performed by Charles F. Kuntz, CPA. The debtors are informed that the rates reflected in said Verified Statement are standing billing rates charged by Charles F. Kuntz, CPA for rendering similar accounting services.

6. The debtors submit that it is necessary, essential, and in the best interests of the estates to be authorized to employ Charles F. Kuntz, CPA to render the professional services set forth above and in the Verified Statement. The compensation requested by Charles F. Kuntz, CPA is appropriate and reasonable in view of the size of the debtors' operations and the amount of work which may be required. Charles F. Kuntz, CPA is well qualified to perform the services described herein, and the debtors know of no reason why the firm should not be retained.

7. Charles F. Kuntz, CPA intends to bill the debtors each month for all professional services rendered and out-of-pocket disbursements incurred. Charles F. Kuntz, CPA has requested that his

charges and reimbursement be paid on a periodic basis based upon detailed statements, with all such payments to be made on account of a final application for compensation and reimbursement.

8. To the best of applicant's information, knowledge, and belief, Charles F. Kuntz, CPA represents no interest adverse to the debtors, their estates or creditors in the matters for which the firm is to be retained, as is set forth in the Verified Statement attached hereto as Exhibit A. If the retention of Charles F. Kuntz, CPA is not approved, the debtors and their creditors would be severely prejudiced because obtaining independent accounting services from another firm would generate additional operating expenses and delays and would deprive the debtors of the services of professionals whom they deem best suited to the overall circumstances of this case.

9. The debtors request that the entry of an order authorizing retention of Charles F. Kuntz, CPA be without prejudice to such amendments as may be necessary and advisable in order to modify the scope or extent of the services to be rendered in connection with the debtors' accounting requirements, subject to approval and authorization by the Court.

10. No previous application for the relief sought herein has been made.

11. Debtors will serve this motion on the creditors and parties registered to receive notice by CM/ECF or by mail. In light of the nature of the relief requested herein, the debtors submit that no other or further notice is necessary.

WHEREFORE, the debtors respectfully request this honorable Court to enter an order approving the employment of as accountant for the debtors in this case and approving the post-petition services provided as necessary and compensable upon application by Charles F. Kuntz, CPA.

WHEREFORE, the Debtors respectfully request this honorable Court to enter an order approving the employment of Charles F. Kuntz, CPA as the accountant for the debtors.

Dated: 05/27/2010

Respectively Submitted,

KINKEAD LAW OFFICES

By /s/ Bill Kinkead
Bill Kinkead
Attorney for Debtors
6937 Bell Suite G
Amarillo, Texas 79109
(806) 353-2129
Fax (806) 353-4370

CERTIFICATE OF SERVICE

This is to certify that a true and correct copy of the above and foregoing document was this 27th day of May 2010 served electronically by CM/ECF and/or by mail on all parties in interest registered with the U.S. Bankruptcy Court to receive electronic notices or having filed a request to receive a copy of all documents filed in the above-referenced cases as follows:

BY CM/ECF:

Misti L. Beanland on behalf of Creditor Summers Group, Inc. dba Rexel
beanland@mssattorneys.com

Thomas A. Bunkley on behalf of Creditor National Bank of Commerce
bunkley41@hotmail.com

Daniel M. Eliades on behalf of Creditor Baymont Franchise Systems, Inc.
deliades@formanlaw.com, dcatuogno@formanlaw.com

Melanie Pearce Goolsby on behalf of Creditor Dilip Patel
mgoolsby@pronskepatel.com,
gpronske@pronskepatel.com; rpatel@pronskepatel.com; cstephenson@pronskepatel.com; jkathman@pronskepatel.com; smeiners@pronskepatel.com; admin@pronskepatel.com; lwhatley@pronskepatel.com

Charles Dick Harris on behalf of Creditor Citizens National Bank - Farmers National Bank of Seymour
dharris_law_firm@swbell.net

Gabriel Dean Herald on behalf of Creditor Citizens National Bank - Farmers National Bank of Seymour
gabeherald@roserockbank.com

John D. Herberger on behalf of Creditor Colorado Electric Supply, Ltd.
john@herbergerlaw.com

David M. Jones on behalf of Creditor Harish L. Patel and Preyesh Kumar
bankruptcy.docs@sprouselaw.com

Bill Kinkead on behalf of Consolidated debtor Borger Hospitality, Inc.
bkinkead713@hotmail.com, billkinkead@gmail.com

Jeff Lashaway on behalf of Creditor Ferguson Enterprises, Inc.
jlashaway@bd-llp.com

Myrtle Davis McDonald on behalf of Creditor West Texas State Bank

mmcdonald@epiqtrustee.com

Christen Carlson Paquin on behalf of Creditor Cowtown Materials, Inc.
cpaquin@mssattorneys.com

DLayne Peeples on behalf of Creditor Hutchinson County Appraisal District c/o
abragg@pbfc.com

Richard B. Schiro on behalf of Creditor Signature Services Corporation
ampike@schirrolaw.com

Michael Wayne Sebesta on behalf of Creditor Triple J Alarm Systems, Inc.
msebesta@chfirm.com, chps.ecfnotices@gmail.com

Michelle E. Shiro on behalf of Creditor Baymont Franchise Systems, Inc.
mshiro@singerlevick.com, ckirkland@singerlevick.com;croote@singerlevick.com

Michael Andrew Stewart on behalf of Creditor CitizensBank
astewart@mhba.com

Don Dwight Sunderland on behalf of Creditor Interstate Bank, SSB
glgrant@mhba.com, dsunderl@mhba.com

UST U.S. Trustee
ustpreion06.da.ecf@usdoj.gov, albert.loftus@usdoj.gov

Elizabeth Weller on behalf of Creditor Wise CAD
dallas.bankruptcy@publicans.com

Charles Coleman Young on behalf of Creditor Gaurav Patel
cole@templetonsmithe.com, tamme@templetonsmithe.com

BY MAIL:

David S. Catuogno
Forman Holt Eliades & Ravin LLC
80 Route 4 East, Ste. 290
Paramus, NJ 07652

Kirk Crutcher
Mayfield, Crutcher & Sharpee, LLP
320 S. Polk, Ste. 400
Amarillo, TX 79101

Scott W. Sharp on behalf of Creditor Associated Supply Company, Inc.
Timberlake, Weaver & Sharp, P.C.

1408 A Buddy Holly Avenue
Lubbock, TX 79401

/s/ **Bill Kinkead**

Bill Kinkead

EXHIBIT A

VERIFIED STATEMENT

CHARLES F. KUNTZ, CPA

FOR

WHEELER HOSPITALITY, INC. CASE NO. 10-20166-rlj11

PERRYTON HOSPITALITY, INC. CASE NO. 10-20167-rlj11

BORGER PROPERTIES, INC. CASE NO. 10-20168-rlj11

CHILDRESS HOSPITALITY, L.P. CASE NO. 10-20169-rlj11

BORGER HOSPITALITY, INC. CASE NO. 10-20170-rlj11

DECATUR HOSPITALITY, INC. CASE NO. 10-20171-rlj11

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DECATUR HOSPITALITY, INC.	§	CASE NO. 10-20171-rlj11
Debtors	§	
	§	Jointly Administered Under
	§	CASE NO. 10-20166-rlj11

VERIFIED STATEMENT OF ACCOUNTANT

Comes Now, Charles F. Kuntz, C.P.A. (the “Firm”) and in support of the Application filed by the Debtors in Possession (“Debtors”) set out in the caption hereto for employment of Charles F. Kuntz, C.P.A. and his Firm as the accountant for their Chapter 11 estates states as follows:

1. I am a C.P.A. doing business at 111 West Texas Ave., Wheeler TX 79096 and 315 N. Main, Shamrock, TX 79079
2. To the best of my knowledge, each member of my Firm, who will be involved in and paid for providing accounting services to the Debtors, is a “disinterested person” in the above Chapter 11 cases, and no such member represents and holds any interest adverse to the estates in the matters upon which this firm is engaged.
3. The Firm has participated in providing general accounting services to the Debtors for years prior to the filing of these Chapter 11 cases. To the best of my knowledge no member of this firm has any connection with the Debtors, their creditors or any other party in interest except that this Firm has represented the Debtors by providing

routine business accounting services in the past years prior to their Chapter 11 filings for which all fees for services have been paid except as set out herein.

4. The Firm was owed small sums of money for services rendered pre-petition in the month prior to the filing of the bankruptcies as set out in Proof of Claims filed. The Firm will withdraw and forgive these pre-petition obligations in order to fully satisfy any no conflict of interest requirements

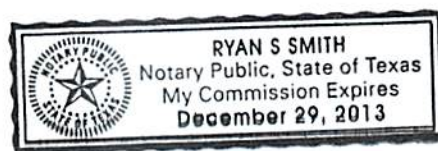
5. This Firm is willing to represent the Debtors at its normal hourly rates which is set out in an attachment hereto. This firm understands that the allowance of fees will be subject to Court Approval.

Dated: 4-22-2010

Charles F. Kuntz C.P.A.
Charles F. Kuntz, C.P.A.

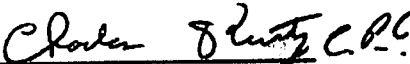
SWORN TO AND SUBSCRIBED TO BEFORE ME by Charles F. Kuntz, C.P.A. on this 22 day of April, 2010.

Ryan Smith
Notary Public in and for
State of Texas



BORGER HOSPITALITY

Payroll calculations, monthly reports	\$ 150.00	Flat fee per month
Check charges	\$ 0.15	per check X number of checks
Postage		Actual expense charged
Tax Preparation	CPA	\$ 150.00 an hour X time spent
	Staff Accountant	\$ 110.00 an hour X time spent
	Staff Accountant	\$ 105.00 an hour X time spent
	Computer Assistant	\$ 80.00 an hour X time spent
	Computer Assistant	\$ 65.00 an hour X time spent


Charles F. Kuntz, CPA

04-20-10


Harish Patel, President

BORGER PROPERTIES INC

Fees calculated as preparation needs arise:

Check charges \$ 0.15 per check X number of checks

Postage Actual expense charged

Tax Preparation	CPA	\$ 150.00	an hour X time spent
	Staff Accountant	\$ 110.00	an hour X time spent
	Staff Accountant	\$ 105.00	an hour X time spent
	Computer Assistant	\$ 80.00	an hour X time spent
	Computer Assistant	\$ 65.00	an hour X time spent


Charles F. Kuntz, CPA

04-20-10


Harish Patel, President

CHILDRESS HOSPITALITY

Payroll calculations, monthly reports	\$ 130.00	Flat fee per month
Check charges	\$ 0.15	per check X number of checks
Postage		Actual expense charged
Tax Preparation	CPA	\$ 150.00 an hour X time spent
	Staff Accountant	\$ 110.00 an hour X time spent
	Staff Accountant	\$ 105.00 an hour X time spent
	Computer Assistant	\$ 80.00 an hour X time spent
	Computer Assistant	\$ 65.00 an hour X time spent


Charles F. Kuntz, CPA

04-20-10


Harish Patel, President

DECATUR HOSPITALITY

Fees calculated as preparation needs arise:

Check charges \$ 0.15 per check X number of checks

Postage

Actual expense charged

Tax Preparation	CPA	\$ 150.00	an hour X time spent
	Staff Accountant	\$ 110.00	an hour X time spent
	Staff Accountant	\$ 105.00	an hour X time spent
	Computer Assistant	\$ 80.00	an hour X time spent
	Computer Assistant	\$ 65.00	an hour X time spent



Charles F. Kuntz, CPA

04-20-10



Harish Patel, President

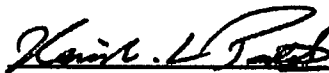
PERRYTON HOSPITALITY

Payroll calculations, monthly reports	\$ 150.00	Flat fee per month
Check charges	\$ 0.15	per check X number of checks
Postage		Actual expense charged
Tax Preparation		
CPA	\$ 150.00	an hour X time spent
Staff Accountant	\$ 110.00	an hour X time spent
Staff Accountant	\$ 105.00	an hour X time spent
Computer Assistant	\$ 80.00	an hour X time spent
Computer Assistant	\$ 65.00	an hour X time spent



Charles F. Kuntz, CPA

04-20-10



Harish Patel, President

WHEELER HOSPITALITY

Payroll calculations, monthly reports	\$ 150.00	Flat fee per month
Check charges	\$ 0.15	per check X number of checks
Postage		Actual expense charged
Tax Preparation		
CPA	\$ 150.00	an hour X time spent
Staff Accountant	\$ 110.00	an hour X time spent
Staff Accountant	\$ 105.00	an hour X time spent
Computer Assistant	\$ 80.00	an hour X time spent
Computer Assistant	\$ 65.00	an hour X time spent



Charles F. Kuntz, CPA

04-20-10



Harish Patel, President